

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**NELSON GOMES, MICHAEL
LUCKHOO-BOUCHE, SHANE
SCHMIDT, DOUGLAS ROE, KELLY
WARAWA, FFS CAPITAL LIMITED,
PAIFANG TRADING LIMITED,
ARTEFACTOR LIMITED,
ATLANTEAN MANAGEMENT
CORPORATION, MEADOW ASIA
LIMITED, and THYME
INTERNATIONAL LIMITED**

Defendants.

Civil Action No. 20-CV-11092-FDS

SUPPLEMENTAL DECLARATION OF TREVOR T. DONELAN

I, Trevor T. Donelan, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. Since September 2014, I have been employed as an Enforcement Accountant with the U.S. Securities and Exchange Commission (“the Commission”) in its Boston Regional Office. My duties include conducting investigations relating to potential violations of the federal securities laws.

2. I received a Bachelor of Science degree in business administration, with a concentration in accounting, from the University of Richmond in Virginia in 2000. Before joining the Commission, I was most recently a managing director in the forensic accounting and complex business litigation unit at StoneTurn Group, LLP (“StoneTurn”), in Boston, where I worked for over seven years. Before joining StoneTurn, I held forensic accounting

and auditor positions for a total of approximately seven years with Deloitte Financial Advisory Services LLP, and Arthur Andersen LLP, both in Boston.

3. I am a Certified Public Accountant in the Commonwealth of Massachusetts, and a Certified Fraud Examiner by the Association of Certified Fraud Examiners. I am also Certified in Financial Forensics by the American Institute of Certified Public Accountants.

4. I make this Declaration based upon my personal knowledge and upon information and belief as set forth below, and in support of the Commission's Motion for Civil Penalties Against Defendants Douglas Roe ("Roe") and Atlantean Management Corporation ("Atlantean").

5. I previously submitted declarations in this case in support of the Commission's Motion for a Temporary Restraining Order, Order Freezing Assets, and Order for Other Equitable Relief (Dkt. No. 5) and the Commission's motion for default judgments against a number of defaulting defendants (Dkt. No. 46).

6. In or about November 2018, I became actively involved in the Commission's investigation into possible violations of the federal securities laws by the defendants in this case.

7. In the course of that investigation, I reviewed documents and data produced to the Commission and attended witness interviews. The purpose of this declaration is to relay certain information that the Commission has gathered about Roe and Atlantean through my review and analysis of certain documents.

8. The principal sources of documentation produced to the Commission that I have relied upon for this declaration include, but are not limited to: brokerage records for certain of the defendants' accounts held at domestic and foreign broker-dealers, banking

records for certain of the defendants' accounts and documents produced by various third parties.

9. As described in paragraphs 48 through 49 of the Complaint, Atlantean transferred its shares of Sandy Steele Unlimited Inc. ("Sandy Steele") to Gomes' entity, defendant FFS Capital Limited ("FFS Capital") (formerly known as FIFO Trader Limited). Further, as described in paragraph 61 of the Complaint, Gomes then sold some of those shares, generating proceeds of at least \$1.8 million.

10. Based on my review of bank records for FFS Capital and Atlantean, between November 2019 and February 2020, Gomes caused FFS Capital to remit a portion of his proceeds from selling Sandy Steele shares to the defendants in this case. Gomes caused FFS Capital to pay \$514,502 of those proceeds to Atlantean's U.S. Dollar-denominated account at TD Bank in Canada. Each of the wire transfers from FFS Capital to Atlantean referenced Sandy Steele's trading symbol, "SSTU." I have observed the following transfers in FFS Capital's bank records:

Date of Transfer	Transfer From	Transfer To	USD Amount
11/8/2019	FFS Capital (DBS Bank)	Atlantean (TD Bank)	\$260,791.09
11/20/2019	FFS Capital (DBS Bank)	Atlantean (TD Bank)	\$68,162.21
12/16/2019	FFS Capital (DBS Bank)	Atlantean (TD Bank)	\$51,560.77
12/31/2019	FFS Capital (DBS Bank)	Atlantean (TD Bank)	\$117,028.70
2/3/2020	FFS Capital (Overseas Chinese Banking Corp)	Atlantean (TD Bank)	\$16,959.26

11. Based on my review of banking records for Atlantean, on or about November 8, 2019, Roe paid by check, CAD \$20,887.50 of the sum Atlantean had received from FFS Capital to an entity named 1181923 BC Ltd., which, based on incorporation records I reviewed, was controlled by defendant Schmidt. The payment to Schmidt's company was

made on the same day that FFS Capital wired the first Sandy Steele proceeds to Atlantean. The USD equivalent of the payment to Schmidt on November 8, 2019 was \$15,802, using the Federal Reserve's USD-CAD daily exchange rate.

12. Based on my review of FFS Capital bank records, I have calculated that another entity controlled by Roe through his wife received a wire payment of \$33,933 from FFS Capital on April 9, 2020 representing proceeds from Gomes' and his entities' trading in Sandy Steele stock.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 11, 2022, in Boston, Massachusetts.


Trevor T. Donelan